

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

MOBILITY WORKX LLC,

Plaintiff,

v.

AMAZON.COM SERVICES LLC and
AMAZON WEB SERVICES, INC.,

Defendants.

Civil Action No. 4:24-cv-01060-ALM

JURY TRIAL DEMANDED

**PLAINTIFF'S UNOPPOSED MOTION FOR AN EXTENSION OF TIME
FOR PLAINTIFF TO RESPOND TO DEFENDANTS' MOTION TO DISMISS**

Plaintiff Mobility Workx LLC (“Mobility Workx” or “Plaintiff”) respectfully files this unopposed motion to extend its time to respond to Defendants Amazon.com Services LLC and Amazon Web Services, Inc.’s (collectively “Amazon” or “Defendants”) Motion to Dismiss for Improper Venue and Failure to State a Claim. Dkt. 18.

Defendants filed their Motion on February 13, 2025. Plaintiff’s current deadline to respond to the Motion is February 27, 2025. Plaintiff respectfully requests an extension of time for Plaintiff to file its response up to and including **March 13, 2025**.

Plaintiff does not file this Motion for the purpose of delay, but rather to allow Plaintiff sufficient time to adequately address the Motion, and in order that justice be done. Plaintiff has conferred with Defendants regarding this motion and Defendants do not oppose it.

Dated: February 26, 2025

Respectfully submitted,

/s/ Daniel B. Ravicher

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Attorneys for Plaintiff Mobility Workx LLC

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Plaintiff conferred with counsel for Defendants, and this motion is unopposed.

/s/ Daniel B. Ravicher

Daniel B. Ravicher

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of February 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Daniel B. Ravicher

Daniel B. Ravicher